



July 9, 2025

NMOCD District 2  
Mr. Mike Bratcher  
Artesia, NM 88210

Bureau of Land Management  
Ms. Crisha Morgan  
620 East Green Street  
Carlsbad, NM 88220

**Re: Site Assessment, Remediation, and Closure Request**  
**Red Lake 32 State Battery**  
**API No. N/A**  
**GPS: Latitude 32.78448 Longitude -104.29225**  
**U/L "P," Sec. 32, T17S, R27E**  
**Eddy County, NM**  
**NMOCD Ref. No. NAPP2500648348**

Paragon Environmental LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment and conduct remediation activities for the release site known as the Red Lake 32 State Battery (Red Lake). Details of the release are summarized below:

Release Details			
<b>Type of Release:</b>	Produced Water / Crude Oil	<b>Volume of Release:</b>	10 bbls
		<b>Volume Recovered:</b>	9 bbls
<b>Source of Release:</b>	Fire Tube Failure	<b>Date of Release:</b>	12/26/2024
<b>Was Immediate Notice Given?</b>	No	<b>If, Yes, to Whom?</b>	N/A
<b>Was a Watercourse Reached?</b>	No	<b>If Yes, Volume Impacting Watercourse:</b>	N/A
<b>Surface Owner:</b>	State	<b>Mineral Owner:</b>	State
FIRE TUBE ON HEATER FAILED AND RELEASED OIL AND PW INTO UNLINED CONTAINMENT.			

Topographical and Wetlands Maps are provided in Figures #2 and #4.

## REGULATORY FRAMEWORK & SITE CHARACTERIZATION

Surface impacts from unauthorized releases of fluids or gases are generally regulated by the New Mexico Oil Conservation Division (NMOCD) in accordance with 19.15.29 of the New Mexico Administrative Code (NMAC). 19.15.29 NMAC establishes reporting, site assessment/characterization, remediation, closure, variance, and enforcement procedures. Table I of 19.15.29.12 NMAC determines the closure criteria for soils impacted by a release based on depth to groundwater and the following characteristics:

- Depth to Groundwater in the affected area 26-50'
- Method to determine DTW NM OSE
- Did the release impact groundwater or surface water No

Depth to groundwater information is provided in Appendix A.

What are the minimum distances between the closest lateral extents of the release and the following surface areas:

- A Continuously flowing watercourse or any other significant watercourse- 1-5 mile
- Any lakebed, sinkhole, or playa lake- 1-5 mi
- An occupied permanent residence, school, hospital, institution, or church- 1-5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes- 1-5 mi
- Any other fresh water well or spring- 1-5 mi
- Incorporated municipal boundaries or a defined municipal fresh water well field- 1-5 mi
- A wetland- 1-5 mi
- A subsurface mine- >5 mi
- An (non-karst) unstable area- Zero feet, overlying, or within the area
- Categorize the risk of this well/site being in a karst area geology- High
- A 100-year floodplain- 1-5 mi
- Did the release impact areas not on an exploration, development, production, or storage site- Yes

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Artesia Group (Guadalupean)—Shelf facies forming broad south-southeast trending outcrop from Glorieta to Artesia area; includes Tansill, Yates, Seven Rivers, Queen and Grayburg Formations (Guadalupean). May locally include Moenkopi Formation (Triassic) at top (PAT). The soil in this area is made up of Gypsum Land, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage course in this area is well drained.

The Soil Survey and FEMA Flood Map are provided in Appendix B. A Karst Map is provided in Figure #3.

### INITIAL SITE ASSESSMENT

On January 9<sup>th</sup>, 2025, Paragon went to the Red Lake and conducted an initial site assessment and obtained soil samples. During the initial site assessment, five (5) soil samples were collected in the spill zone, labeled S, and six (6) horizontal samples were collected outside the spill zone, labeled HZ. During the process of obtaining these samples, they were field tested in an effort to determine the vertical and horizontal extent of soil impact. A table summarizing the titration results from the soil samples collected during the above-stated activities is provided below:

1-9-25 Soil Sample Results

Red Lake 32 #2 Field Testing		
Sample Date 1/9/25		
Sample ID	Depth (BGS)	CHLORIDES
S-1	3'	425
S-2	4'	ND
S-3	4'	ND
S-4	4'	425
S-5	4'	283
H-1	2'	425
H-2	2'	425
H-3	2'	283
H-4	2'	283
H-5	2'	425
H-6	2'	425

(ND) Analyte Not Detected

Laboratory data is attached in Appendix D

A Site Map is provided in Figure #1.

## REMEDIATION ACTIVITIES

Based on the analytical results, site characteristics, and field observations made during the site assessment, Paragon conducted the following remedial activities to advance the Release Site towards an NMOCD and BLM-approved closure:

- Utilizing a hand crew, starting on March 3, 2025, we excavated the impacted soils that were above the NMOCD Closure Criteria to depths ranging from 3-4 feet BGS. Refer to the Confirmation Sample Map, which illustrates the areas of excavation and varying depths, as shown in Figure 5.
  - The area of S-1 we excavated to a depth of 3 feet BGS. This was approximately 200 s/f and 22 cubic yards.
  - The areas of S-2 to S-5 were excavated to a depth of 4 feet BGS. These were approximately 800 s/f and 118 yards.
  - The total remediated area and volume totaled approximately 1,000 square feet and 140 cubic yards.

An email notification was sent to the NMOCD prior to obtaining confirmation samples. The bottom samples were representative of no more than 200 sq/ft, and the sidewall samples were obtained every 50 feet. The results of these sampling events are in the following data table:

4-4-25 Confirmation Laboratory Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')							
Sample Date 4-4-25	Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria ≤ 100 mg/kg	Closure Criteria ≤ 600 mg/kg
Sample ID	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S-1 3'	ND	ND	ND	ND	ND	ND	48
S-2 4'	ND	ND	ND	ND	ND	ND	48
S-3 4'	ND	ND	ND	ND	ND	ND	48
S-4 4'	ND	ND	ND	ND	ND	ND	32
S-5 4'	ND	ND	ND	ND	ND	ND	240
NSW- 1 4'	ND	ND	ND	ND	ND	ND	160
ESW- 2 4'	ND	ND	ND	ND	ND	ND	208
ESW- 3 4'	ND	ND	ND	ND	ND	ND	144
SSW- 4 3'	ND	ND	ND	ND	ND	ND	112
WSW-5 4'	ND	ND	ND	ND	ND	ND	112
WSW- 6 4'	ND	ND	ND	10.1	13.2	23.3	96
WSW- 7 3'	ND	ND	ND	16.6	52.1	68.7	96
ESW- 8 3'	ND	ND	ND	ND	ND	ND	96

(ND) Analyte Not Detected

These laboratory analytical results showed that the confirmation soil samples were below NMOCD Closure Criteria. The excavated soils were loaded into trucks and transported to Lea Land, an NMOCD-approved waste disposal facility. After receiving laboratory analytical results below the closure criteria, on April 14<sup>th</sup>, 2025, the excavated areas were backfilled with “like” material from Lea Land. The affected area was then contoured and compacted to match the surrounding grade. Please refer to the attached lab report in Appendix D to see the Lea Land Backfill Analytical Results showing they are within closure criteria.

## Lea Land Backfill Confirmation Sample

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')							
Sample Date 5-22-24	Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria ≤ 100 mg/kg	Closure Criteria ≤ 600 mg/kg
Sample ID	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
Lea Land Backfill	ND	ND	ND	ND	ND	ND	ND

## CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2500648348, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

If you have any questions or need additional information, please get in touch with Tristan Jones by phone at (575)318-6841 or email at [tristan@paragonenvironmental.net](mailto:tristan@paragonenvironmental.net).

Respectfully,



Tristan Jones  
Project Manager  
Paragon Environmental, LLC



Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



### Attachments

#### **Figures:**

- 1- Site Map
- 2- Topographic Map
- 3- Karst Map
- 4- Wetlands Map
- 5- Confirmation Sample Map

#### **Appendices:**

- Appendix A – Referenced Water Surveys
- Appendix B – Soil Survey and FEMA Flood Map
- Appendix C – Email Notification & Photographic Documentation
- Appendix D – Laboratory Reports



Figures:

- 1- Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Wetlands Map
- 5- Confirmation Map



# Spur Energy Partners

Red Lake 32 St 2H Battery  
API # 30-015-44948  
Eddy County, NM  
Site Map

## Legend

- Feature 1
- Red Lake 32 St 2H Battery 32.7845041,-104.2925802
- Spill Area

Red Lake 32 St 2H Battery 32.7845041,-104.2925802



Google Earth

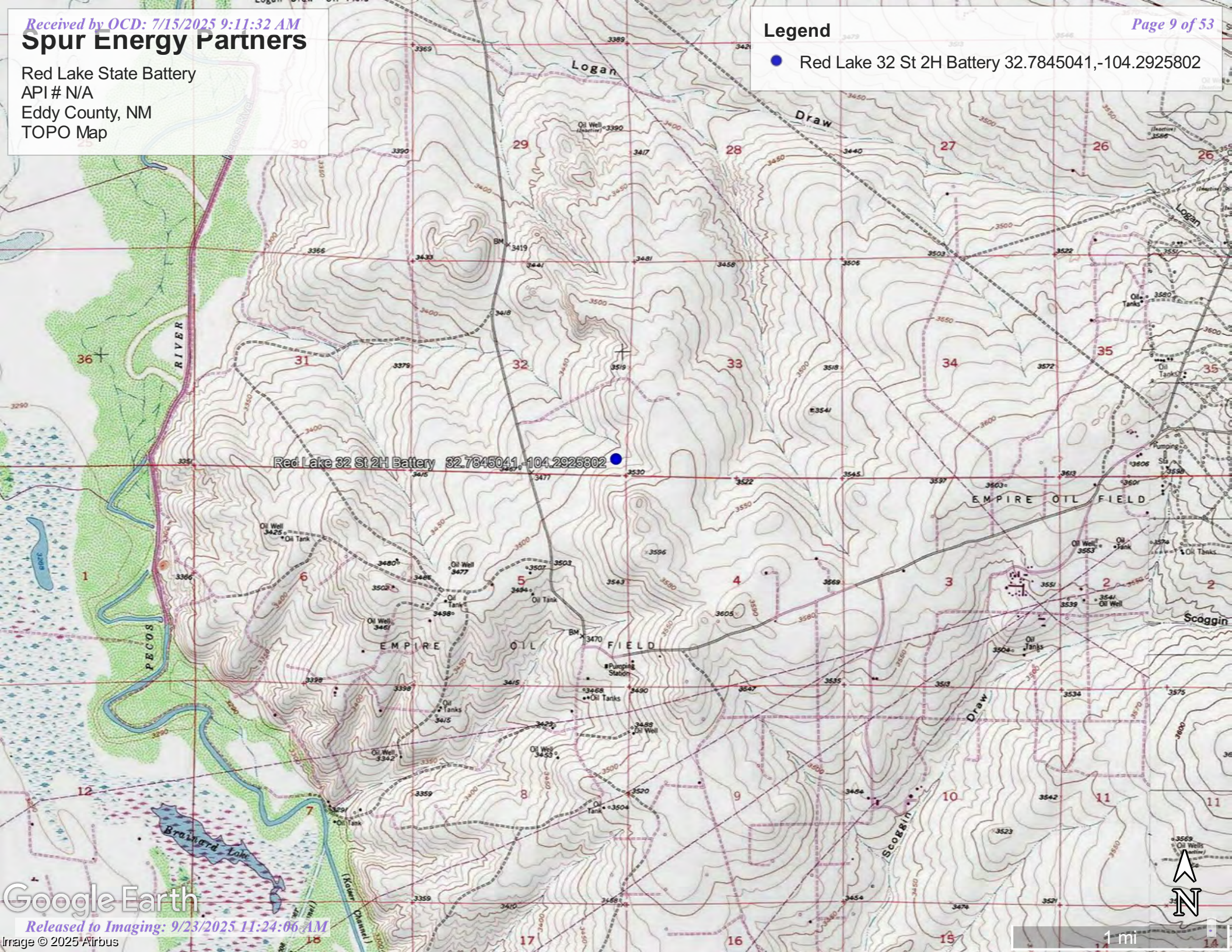


# Spur Energy Partners

Red Lake State Battery  
API # N/A  
Eddy County, NM  
TOPO Map

Legend

Red Lake 32 St 2H Battery 32.7845041,-104.2925802





# Spur Energy Partners

Red Lake State Battery

API # N/A

Eddy County, NM

Karst Map

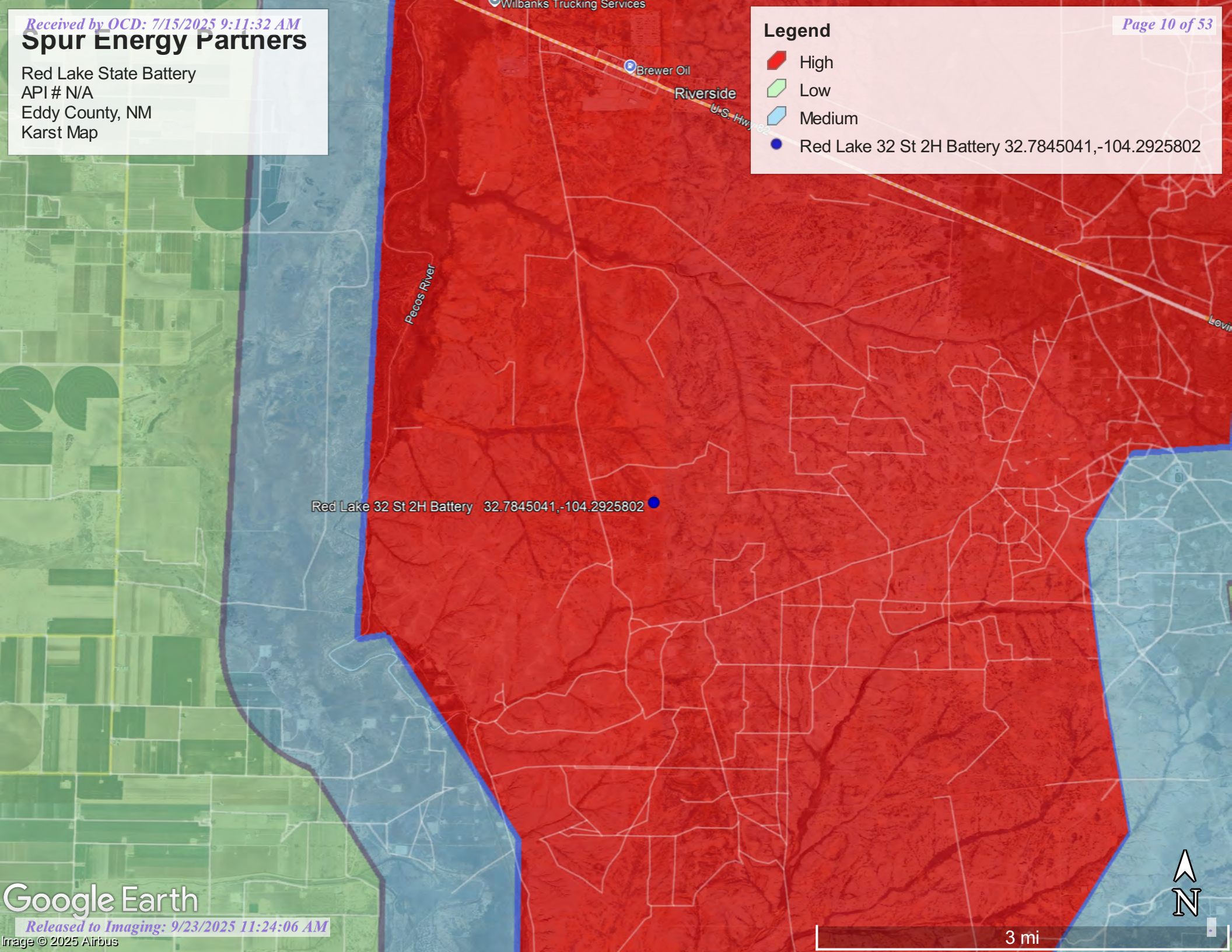
## Legend

High

Low

Medium

Red Lake 32 St 2H Battery 32.7845041,-104.2925802






Red Lake 32 St 2H Battery 32.7845041,-104.2925802

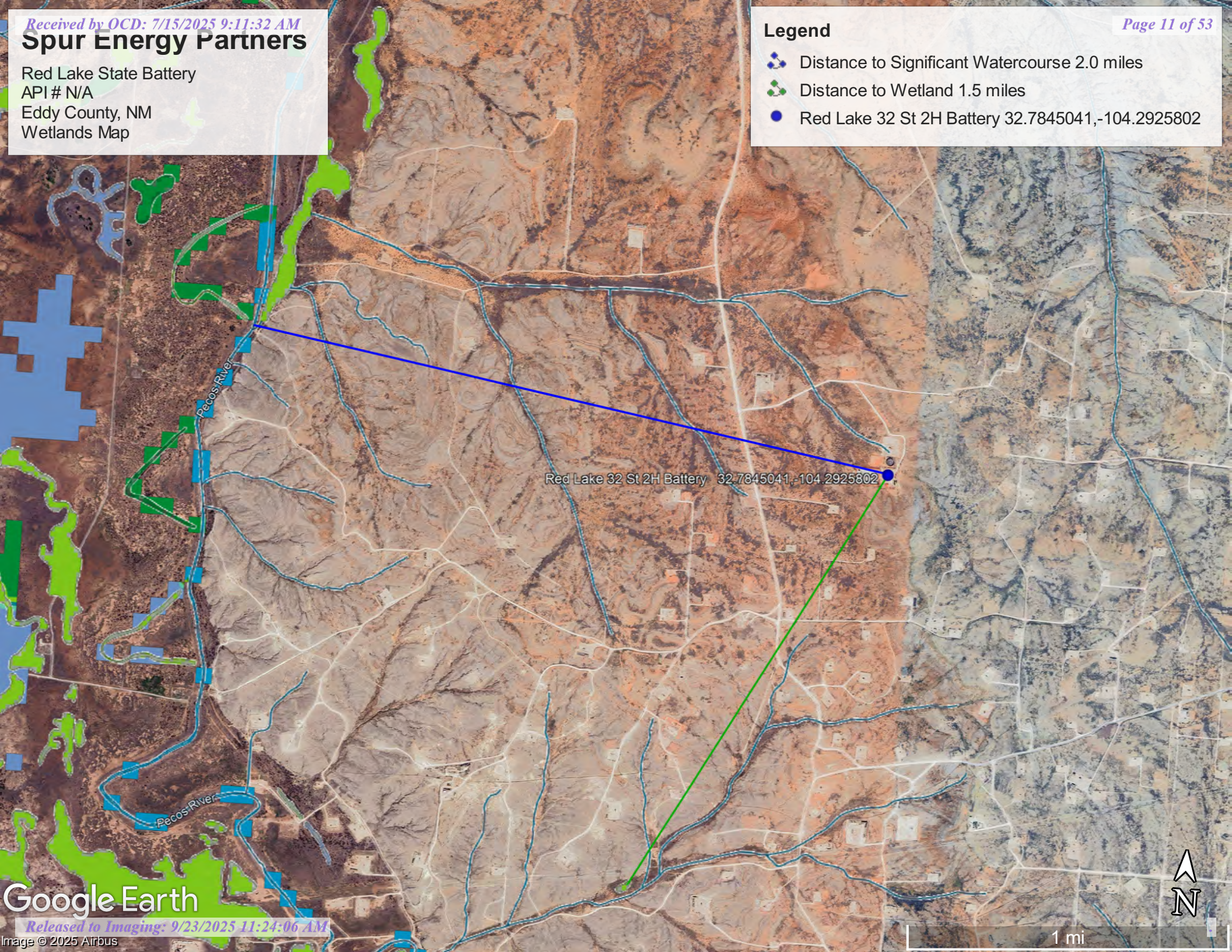


# Spur Energy Partners

Red Lake State Battery  
API # N/A  
Eddy County, NM  
Wetlands Map

## Legend

-  Distance to Significant Watercourse 2.0 miles
-  Distance to Wetland 1.5 miles
-  Red Lake 32 St 2H Battery 32.7845041,-104.2925802



Google Earth



# Spur Energy Partners





Red Lake State Battery

API # N/A

Eddy County, NM

Confirmation Sample Map

## Legend

-  3' Spill Area
-  4' Spill Area
-  Red Lake 32 St 2H Battery 32.7845041,-104.2925802
-  Sample Points

Red Lake 32 St 2H Battery 32.7845041,-104.2925802





Appendix A  
Referenced Water Data:

New Mexico State of Engineers Office

# Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)




(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

(In feet)

POD Number	Code	Sub basin	County	Q64	Q16	Q4	Sec	Tws	Range	X	Y	Map	Distance	Well Depth	Depth to Water
<a href="#">RA 13283 POD1</a>		RA	ED	NE	SW	NW	33	17S	27E	566598.6	3628656.5		1090	101	
<a href="#">RA 03661</a>		RA	ED	SW	NE	SW	32	17S	27E	565186.0	3628038.0 *		1170	330	140
<a href="#">RA 03664</a>		RA	ED	SW	NE	SW	32	17S	27E	565186.0	3628038.0 *		1170	400	100

Average Depth to Water

Minimum Depth to Water

Maximum Depth to Water



**Record Count:** 3

**UTM Filters (in meters):**

**Easting:** 566276.667

**Northing:** 3627614.474

**Radius:** 1600.0

\* UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.





Appendix B  
Soil Survey:

U.S.D.A.  
FEMA Flood Map

Map Unit Description: Gypsum land---Eddy Area, New Mexico

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## Eddy Area, New Mexico

### GA—Gypsum land

#### Map Unit Setting

*National map unit symbol:* 1w4f

*Elevation:* 1,250 to 5,000 feet

*Mean annual precipitation:* 10 to 25 inches

*Mean annual air temperature:* 57 to 66 degrees F

*Frost-free period:* 190 to 225 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Gypsum land:* 98 percent

*Minor components:* 2 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Gypsum Land

##### Setting

*Landform:* Ridges, plains, hills

*Landform position (two-dimensional):* Shoulder, backslope, footslope, toeslope

*Landform position (three-dimensional):* Side slope, head slope, nose slope, crest

*Down-slope shape:* Convex

*Across-slope shape:* Linear

*Parent material:* Residuum weathered from gypsum

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 8s

*Hydric soil rating:* No

#### Minor Components

##### Reeves

*Percent of map unit:* 1 percent

*Ecological site:* R070BC033NM - Salty Bottomland

*Hydric soil rating:* No

##### Cottonwood

*Percent of map unit:* 1 percent

*Ecological site:* R070BC033NM - Salty Bottomland

*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

# National Flood Hazard Layer FIRMMette



104°17'51"W 32°47'19"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

104°17'13"W 32°46'49"N

Released to Imaging: 9/23/2025 11:24:06 AM

Basemap Imagery Source: USGS National Map 2023

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 6/19/2025 at 8:28 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



Appendix C:

NMOCD Notification

Photographic Documentation



Angel Pena &lt;angel@paragonenvironmental.net&gt;

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**The Oil Conservation Division (OCD) has accepted the application, Application ID: 447777**

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&lt;OCDOnline@state.nm.us&gt;

Tue, Apr 1 at 2:21 PM

To: &lt;angel@paragonenvironmental.net&gt;

To whom it may concern (c/o Angel Pena for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2500648348.

The sampling event is expected to take place:

**When:** 04/04/2025 @ 08:00

**Where:** P-32-17S-27E 0 FNL 0 FEL (32.78448,-104.29225)

**Additional Information:** Angel Pena  
5756050773

**Additional Instructions:** 32.7845041,  
-104.2925802

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**  
[1220 South St. Francis Drive](#)  
[Santa Fe, NM 87505](#)





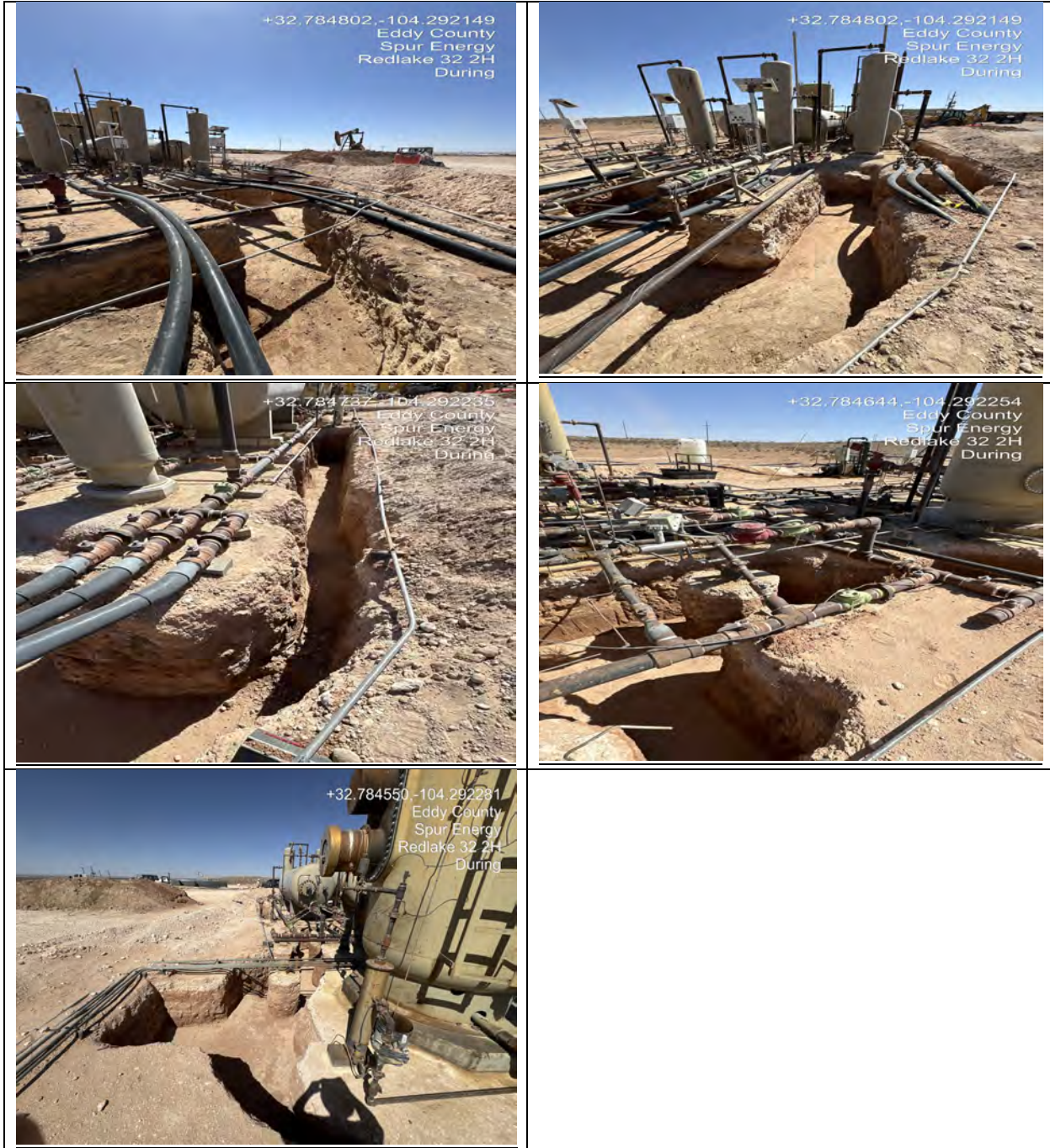
**Photographic Documentation  
Before**







**Photographic Documentation  
During**







**Photographic Documentation  
Post**





Appendix D:  
Laboratory Results

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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June 24, 2025

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: RED LAKE TB 32 2H

Enclosed are the results of analyses for samples received by the laboratory on 04/07/25 16:48.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at

[www.tceq.texas.gov/field/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Total Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B	Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2	Regulated VOCs and Total Trihalomethanes (TTHM)
Method EPA 552.2	Total Haloacetic Acids (HAA-5)

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S-1 3'	H252065-01	Soil	04-Apr-25 00:00	07-Apr-25 16:48
S-2 4'	H252065-02	Soil	04-Apr-25 00:00	07-Apr-25 16:48
S-3 4'	H252065-03	Soil	04-Apr-25 00:00	07-Apr-25 16:48
S-4 4'	H252065-04	Soil	04-Apr-25 00:00	07-Apr-25 16:48
S-5 4'	H252065-05	Soil	04-Apr-25 00:00	07-Apr-25 16:48
NSW- 1 4'	H252065-06	Soil	04-Apr-25 00:00	07-Apr-25 16:48
ESW- 2 4'	H252065-07	Soil	04-Apr-25 00:00	07-Apr-25 16:48
ESW- 3 4'	H252065-08	Soil	04-Apr-25 00:00	07-Apr-25 16:48
SSW- 4 3'	H252065-09	Soil	04-Apr-25 00:00	07-Apr-25 16:48
WSW-5 4'	H252065-10	Soil	04-Apr-25 00:00	07-Apr-25 16:48
WSW- 6 4'	H252065-11	Soil	04-Apr-25 00:00	07-Apr-25 16:48
WSW- 7 3'	H252065-12	Soil	04-Apr-25 00:00	07-Apr-25 16:48
ESW- 8 3'	H252065-13	Soil	04-Apr-25 00:00	07-Apr-25 16:48

06/24/25 - Client changed all samples to composite (see COC). This is the revised report and will replace the one sent on 04/11/25.

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence or any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damage including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**S-1 3'**  
**H252065-01 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134 5040812 JH 09-Apr-25 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

Surrogate: 1-Chlorooctane 80.0 % 44.4-145 5040816 MS 08-Apr-25 8015B

Surrogate: 1-Chlorooctadecane 78.1 % 40.6-153 5040816 MS 08-Apr-25 8015B

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence or any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damage including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**S-2 4'****H252065-02 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			102 %	71.5-134		5040812	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

Surrogate: 1-Chlorooctane			92.0 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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Surrogate: 1-Chlorooctadecane			89.9 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**S-3 4'****H252065-03 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134 5040812 JH 09-Apr-25 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

Surrogate: 1-Chlorooctane 93.4 % 44.4-145 5040816 MS 08-Apr-25 8015B

Surrogate: 1-Chlorooctadecane 93.7 % 40.6-153 5040816 MS 08-Apr-25 8015B

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**S-4 4'****H252065-04 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>32.0</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150	0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300	0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>		107 %		71.5-134	5040812	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>		90.9 %		44.4-145	5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>		89.0 %		40.6-153	5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**S-5 4'**  
**H252065-05 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>240</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050	0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150	0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300	0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)	103 %	71.5-134	5040812	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

Surrogate: 1-Chlorooctane	94.7 %	44.4-145	5040816	MS	08-Apr-25	8015B	
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Surrogate: 1-Chlorooctadecane	93.0 %	40.6-153	5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**NSW- 1 4'**  
**H252065-06 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>160</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040812	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040812	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			106 %	71.5-134		5040812	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			94.6 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			92.6 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**ESW- 2 4'**  
**H252065-07 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>208</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134 5040813 JH 09-Apr-25 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

Surrogate: 1-Chlorooctane 101 % 44.4-145 5040816 MS 08-Apr-25 8015B

Surrogate: 1-Chlorooctadecane 100 % 40.6-153 5040816 MS 08-Apr-25 8015B

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Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**ESW- 3 4'**  
**H252065-08 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>144</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			103 %	71.5-134		5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			98.3 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			96.6 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**SSW- 4 3'**  
**H252065-09 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>112</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			102 %	71.5-134		5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			94.7 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			93.3 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**WSW-5 4'**  
**H252065-10 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>112</b>		16.0	mg/kg	4	5040918	CT	09-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050	0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050	0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150	0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300	0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>		101 %		71.5-134	5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0	10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>		99.8 %		44.4-145	5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>		98.8 %		40.6-153	5040816	MS	08-Apr-25	8015B	
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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**WSW- 6 4'**  
**H252065-11 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>96.0</b>		16.0	mg/kg	4	5040824	AC	08-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			105 %	71.5-134		5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
<b>DRO &gt;C10-C28*</b>	<b>10.1</b>		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			98.5 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			97.5 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**WSW- 7 3'**  
**H252065-12 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>96.0</b>		16.0	mg/kg	4	5040824	AC	08-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			102 %	71.5-134		5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
<b>DRO &gt;C10-C28*</b>	<b>16.6</b>		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			96.1 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			95.2 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**ESW- 8 3'**  
**H252065-13 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>96.0</b>		16.0	mg/kg	4	5040824	AC	08-Apr-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5040813	JH	09-Apr-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5040813	JH	09-Apr-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			103 %	71.5-134		5040813	JH	09-Apr-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5040816	MS	08-Apr-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			103 %	44.4-145		5040816	MS	08-Apr-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			102 %	40.6-153		5040816	MS	08-Apr-25	8015B	
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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**Inorganic Compounds - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5040824 - 1:4 DI Water****Blank (5040824-BLK1)**

Prepared &amp; Analyzed: 08-Apr-25

Chloride	ND	16.0	mg/kg						
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**LCS (5040824-BS1)**

Prepared &amp; Analyzed: 08-Apr-25

Chloride	432	16.0	mg/kg	400	108	80-120			
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**LCS Dup (5040824-BSD1)**

Prepared &amp; Analyzed: 08-Apr-25

Chloride	432	16.0	mg/kg	400	108	80-120	0.00	20	
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**Batch 5040918 - 1:4 DI Water****Blank (5040918-BLK1)**

Prepared &amp; Analyzed: 09-Apr-25

Chloride	ND	16.0	mg/kg						
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**LCS (5040918-BS1)**

Prepared &amp; Analyzed: 09-Apr-25

Chloride	432	16.0	mg/kg	400	108	80-120			
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**LCS Dup (5040918-BSD1)**

Prepared &amp; Analyzed: 09-Apr-25

Chloride	448	16.0	mg/kg	400	112	80-120	3.64	20	
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**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5040812 - Volatiles****Blank (5040812-BLK1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0527		mg/kg	0.0500		105	71.5-134			

**LCS (5040812-BS1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	1.97	0.050	mg/kg	2.00		98.4	82.8-130			
Toluene	1.90	0.050	mg/kg	2.00		94.8	86-128			
Ethylbenzene	1.95	0.050	mg/kg	2.00		97.6	85.9-128			
m,p-Xylene	4.05	0.100	mg/kg	4.00		101	89-129			
o-Xylene	2.01	0.050	mg/kg	2.00		100	86.1-125			
Total Xylenes	6.06	0.150	mg/kg	6.00		101	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0470		mg/kg	0.0500		94.0	71.5-134			

**LCS Dup (5040812-BSD1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	2.01	0.050	mg/kg	2.00		100	82.8-130	1.88	15.8	
Toluene	1.95	0.050	mg/kg	2.00		97.6	86-128	2.90	15.9	
Ethylbenzene	1.97	0.050	mg/kg	2.00		98.3	85.9-128	0.767	16	
m,p-Xylene	4.13	0.100	mg/kg	4.00		103	89-129	1.91	16.2	
o-Xylene	2.06	0.050	mg/kg	2.00		103	86.1-125	2.35	16.7	
Total Xylenes	6.18	0.150	mg/kg	6.00		103	88.2-128	2.05	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0483		mg/kg	0.0500		96.6	71.5-134			

**Batch 5040813 - Volatiles****Blank (5040813-BLK1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5040813 - Volatiles****Blank (5040813-BLK1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0506		mg/kg	0.0500		101	71.5-134			

**LCS (5040813-BS1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	1.86	0.050	mg/kg	2.00		93.2	82.8-130			
Toluene	1.94	0.050	mg/kg	2.00		97.2	86-128			
Ethylbenzene	1.86	0.050	mg/kg	2.00		93.1	85.9-128			
m,p-Xylene	3.72	0.100	mg/kg	4.00		92.9	89-129			
o-Xylene	1.86	0.050	mg/kg	2.00		92.8	86.1-125			
Total Xylenes	5.57	0.150	mg/kg	6.00		92.9	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0496		mg/kg	0.0500		99.2	71.5-134			

**LCS Dup (5040813-BS1)**

Prepared: 08-Apr-25 Analyzed: 09-Apr-25

Benzene	2.03	0.050	mg/kg	2.00		101	82.8-130	8.50	15.8	
Toluene	2.13	0.050	mg/kg	2.00		107	86-128	9.20	15.9	
Ethylbenzene	2.05	0.050	mg/kg	2.00		102	85.9-128	9.55	16	
m,p-Xylene	4.09	0.100	mg/kg	4.00		102	89-129	9.65	16.2	
o-Xylene	2.04	0.050	mg/kg	2.00		102	86.1-125	9.53	16.7	
Total Xylenes	6.14	0.150	mg/kg	6.00		102	88.2-128	9.61	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0495		mg/kg	0.0500		99.0	71.5-134			

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240

Project: RED LAKE TB 32 2H  
Project Number: NOT GIVEN  
Project Manager: CHRIS JONES  
Fax To:

Reported:  
24-Jun-25 16:29

**Petroleum Hydrocarbons by GC FID - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5040816 - General Prep - Organics****Blank (5040816-BLK1)**

Prepared &amp; Analyzed: 08-Apr-25

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	56.5		mg/kg	50.0		113	44.4-145			
Surrogate: 1-Chlorooctadecane	55.9		mg/kg	50.0		112	40.6-153			

**LCS (5040816-BS1)**

Prepared &amp; Analyzed: 08-Apr-25

GRO C6-C10	190	10.0	mg/kg	200		95.2	81.5-123			
DRO >C10-C28	195	10.0	mg/kg	200		97.3	77.7-122			
Total TPH C6-C28	385	10.0	mg/kg	400		96.3	80.9-121			
Surrogate: 1-Chlorooctane	55.7		mg/kg	50.0		111	44.4-145			
Surrogate: 1-Chlorooctadecane	57.0		mg/kg	50.0		114	40.6-153			

**LCS Dup (5040816-BSD1)**

Prepared &amp; Analyzed: 08-Apr-25

GRO C6-C10	193	10.0	mg/kg	200		96.4	81.5-123	1.22	13	
DRO >C10-C28	194	10.0	mg/kg	200		97.2	77.7-122	0.142	15.6	
Total TPH C6-C28	387	10.0	mg/kg	400		96.8	80.9-121	0.533	18.5	
Surrogate: 1-Chlorooctane	55.9		mg/kg	50.0		112	44.4-145			
Surrogate: 1-Chlorooctadecane	56.6		mg/kg	50.0		113	40.6-153			

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

Company Name: Paragon Environmental		P.O. #:		BILL TO									
Project Manager: Chris Jones		Company: <i>SVR</i>		ANALYSIS REQUEST									
Address: 1601 N. Turner St., Ste 500		Attn:											
City: Hobbs		Address:											
Phone #: 575-964-7814		City:											
Fax #:		State:											
Project #:		Zip:											
Project Name: <i>Redlake TB 32 CH</i>		Phone #:											
Project Location: <i>Eddy County</i>		Fax #:											
Sampler Name: <i>Francisco Lobedo</i>													

Sample I.D.	Date	Time	(G)RAB OR (C)OMP	# CONTAINERS	MATRIX							DATE	TIME	TPH	BTEX	CHLORIDES
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:					
<i>AP 47-38</i>																
<i>Lab I.D.</i>																
<i>5-1 3'</i>																
<i>5-2 4'</i>																
<i>5-3 4'</i>																
<i>5-4 4'</i>																
<i>5-5 4'</i>																
<i>15W-1 4'</i>																
<i>15W-2 4'</i>																
<i>15W-3 4'</i>																
<i>15W-4 3'</i>																
<i>15W-5 4'</i>																

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Relinquished By: <i>TC</i>	Date: <i>4-7-05</i>	Received By: <i>AP</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By: <i>TC</i>	Date: <i>10/4/8</i>	Received By: <i>AP</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:

Delivered By: (Circle One) <i>2-3-10</i>	Sample Condition: <input checked="" type="checkbox"/> Intact <input type="checkbox"/> Damaged	CHECKED BY: (Initials) <i>AP</i>
Sampler - UPS - Bus - Other: <i>2-10-10</i>		

REMARKS: *\*Customer requested changes 10/23/05*

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



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### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



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**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 484949

**QUESTIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2500648348
Incident Name	NAPP2500648348 REDLAKE 32 STATE BATTERY @ FAPP2128526738
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2128526738] RED LAKE 32 STATE TANK BATTERY

**Location of Release Source***Please answer all the questions in this group.*

Site Name	REDLAKE 32 STATE BATTERY
Date Release Discovered	12/26/2024
Surface Owner	State

**Incident Details***Please answer all the questions in this group.*

Incident Type	Release Other
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release***Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.*

Crude Oil Released (bbls) Details	Cause: Corrosion   Gasket   Crude Oil   Released: 1 BBL   Recovered: 1 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion   Gasket   Produced Water   Released: 9 BBL   Recovered: 8 BBL   Lost: 1 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	FIRE TUE ON HEATER FAILED AND RELEASED OIL AND PW INTO UNLINED CONTAINMENT

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QUESTIONS, Page 2

Action 484949

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.*

The source of the release has been stopped	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<b>N/A</b>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a> Date: 01/06/2025
--	---



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QUESTIONS, Page 3

Action 484949

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	425
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	68.7
GRO+DRO (EPA SW-846 Method 8015M)	16.6
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	03/03/2025
On what date will (or did) the final sampling or liner inspection occur	04/04/2025
On what date will (or was) the remediation complete(d)	05/22/2025
What is the estimated surface area (in square feet) that will be reclaimed	1000
What is the estimated volume (in cubic yards) that will be reclaimed	140
What is the estimated surface area (in square feet) that will be remediated	1000
What is the estimated volume (in cubic yards) that will be remediated	140

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 484949

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	<a href="#">fEEM0112342028 LEA LAND LANDFILL</a>
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a> Date: 07/15/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5  
  
Action 484949

QUESTIONS (continued)

Operator:  Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:  328947
	Action Number:  484949
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 484949

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	447777
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	04/04/2025
What was the (estimated) number of samples that were to be gathered	13
What was the sampling surface area in square feet	900

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	1000
What was the total volume (cubic yards) remediated	140
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	1000
What was the total volume (in cubic yards) reclaimed	140
Summarize any additional remediation activities not included by answers (above)	SOIL CONTAMINANTS WERE REMOVED IN ACCORDANCE WITH THE MOST STRINGENT NMOC D STANDARDS
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a> Date: 07/15/2025

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QUESTIONS, Page 7

Action 484949

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 484949

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 484949
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	The remediation closure is approved. OCD notes the modification made to the lab Chain of Custody documents. Be advised this is legal document and modifications after the fact may be cause for rejection. It is also noted that time samples were obtained has not been filled in which may also be cause for rejection on future submittals.	9/23/2025